

Pachulski Stang Ziehl & Jones LLP

150 California St.
Floor 15th
San Francisco, CA 94111

Kavita Gupta
Gupta Ferrer LLP
1300 Bristol Street North ste. 100
Newport Beach, CA 92660

July 31, 2021
Invoice 128351
Client 33085
Matter 00001
JDF

RE: Desert Oasis Apartments LLC

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 07/31/2021

FEES	\$50,128.00
EXPENSES	\$142.97
TOTAL CURRENT CHARGES	\$50,270.97
BALANCE FORWARD	\$212,123.74
TOTAL BALANCE DUE	\$262,394.71

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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	800.00	44.10	\$34,720.00
JDF	Fiero, John D.	Partner	800.00	14.20	\$11,360.00
PJJ	Jeffries, Patricia J.	Paralegal	460.00	8.80	\$4,048.00
				67.10	\$50,128.00

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	9.00	\$7,200.00
CA	Case Administration [B110]	5.70	\$4,560.00
CO	Claims Admin/Objections[B310]	31.70	\$24,800.00
CP	Compensation Prof. [B160]	20.70	\$13,568.00
		67.10	<hr/> \$50,128.00

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Auto Travel Expense [E109]	\$30.95
Conference Call [E105]	\$16.83
Federal Express [E108]	\$24.49
Pacer - Court Research	\$45.10
Reproduction/ Scan Copy	\$25.60
	<hr/>
	\$142.97

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bankruptcy Litigation [L430]						
07/02/2021	JDF	BL	Email responding to client inquiry regarding upcoming hearing	0.10	800.00	\$80.00
07/15/2021	GSG	BL	Internal emails with K. Gupta re settlement exchange.	0.20	800.00	\$160.00
07/15/2021	GSG	BL	Telephone call with K. Gupta re mediation brief.	0.60	800.00	\$480.00
07/15/2021	GSG	BL	Review/research rules and cases re conflicts of interest.	0.60	800.00	\$480.00
07/15/2021	GSG	BL	Revise claim objection re Gonzales deed of trust and exhibits for reference.	0.60	800.00	\$480.00
07/15/2021	GSG	BL	Confer with M. Renck re mediation briefing, exhibits, and TOC/TOA.	0.30	800.00	\$240.00
07/15/2021	GSG	BL	Email Gubner re settlement offer.	0.20	800.00	\$160.00
07/15/2021	GSG	BL	Telephone call from C. Carlyon re DL settlement offer and clarification.	0.20	800.00	\$160.00
07/15/2021	GSG	BL	Review J. Fiero comments to mediation brief (.1); telephone call with K. Gupta re mediation brief and comments (.2).	0.30	800.00	\$240.00
07/15/2021	GSG	BL	Emails to/from Fischer re mediation and attach draft claim objection.	0.30	800.00	\$240.00
07/15/2021	GSG	BL	Review/revise claim objection re TOC/TOA and edits.	0.20	800.00	\$160.00
07/15/2021	GSG	BL	Review Bregman email re settlement offer "clarification" and emails re same.	0.10	800.00	\$80.00
07/16/2021	GSG	BL	Review NH brief re comments.	0.40	800.00	\$320.00
07/16/2021	GSG	BL	Review client comments re mediation brief and additional background and conflict arguments.	0.70	800.00	\$560.00
07/16/2021	GSG	BL	Confer with J. Fiero re estimated fees and mediation briefing status.	0.20	800.00	\$160.00
07/16/2021	GSG	BL	Telephone calls and email with L. Schnetzer re mediation procedures and delivery of briefs, and revised order re same.	0.30	800.00	\$240.00
07/16/2021	GSG	BL	Email S. Seflin re mediation offer.	0.10	800.00	\$80.00
07/16/2021	GSG	BL	Revise and finalize mediation brief and claim objections, confer with M. Renck re exhibits and	2.10	800.00	\$1,680.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			binders, and serve mediator by email.			
07/28/2021	GSG	BL	Emails among counsel re settlement status and LBR 9019.	0.20	800.00	\$160.00
07/29/2021	GSG	BL	Review settlement terms in preparation for hearing.	0.30	800.00	\$240.00
07/29/2021	GSG	BL	Review draft settlement agreement and fee application while awaiting hearing.	0.50	800.00	\$400.00
07/29/2021	GSG	BL	Attend telephonic status conference re mediation and settlement.	0.50	800.00	\$400.00
				<u>9.00</u>		<u>\$7,200.00</u>

Case Administration [B110]

07/06/2021	JDF	CA	Review court order re mediation (.1); Confer with G. Greenwood re same (.1)	0.20	800.00	\$160.00
07/06/2021	GSG	CA	Emails to/from M. Wray regarding mediation order and 7/21 appearance.	0.20	800.00	\$160.00
07/06/2021	GSG	CA	Calls and emails re mediation scheduling and order.	0.40	800.00	\$320.00
07/06/2021	GSG	CA	Receive and review further court order; call C. Carlyon and confer with J. Fiero.	0.30	800.00	\$240.00
07/07/2021	JDF	CA	Confer with G. Greenwood re mediation timing (.1); Confer with client re same in conference call including Gail Greenwood (.3)	0.40	800.00	\$320.00
07/07/2021	GSG	CA	Telephone call with C. Carlyon re mediation scheduling.	0.10	800.00	\$80.00
07/07/2021	GSG	CA	Email K. Gupta and J. Fiero and call re 7/8 hearing.	0.20	800.00	\$160.00
07/07/2021	GSG	CA	Telephone call with S. Selflin re 7/21 mediation or alternate July dates.	0.30	800.00	\$240.00
07/07/2021	GSG	CA	Calls/emails with S. Selflin, and C. Carlyon re meet and confer obligation re mediation scheduling; confer with J. Fiero re same.	0.30	800.00	\$240.00
07/07/2021	GSG	CA	Conference call with J. Fiero and K. Gupta re mediation availability.	0.30	800.00	\$240.00
07/07/2021	GSG	CA	Call with M. Wray re 7/21 mediation and scheduling conference.	0.30	800.00	\$240.00
07/08/2021	GSG	CA	Review emails and confer with J. Fiero re 7/8 hearing.	0.10	800.00	\$80.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/12/2021	GSG	CA	Confer with J. Fiero re mediation and briefing.	0.20	800.00	\$160.00
07/14/2021	JDF	CA	Confer with G. Greenwood re settlement posture and strategize re same (.3)	0.30	800.00	\$240.00
07/14/2021	GSG	CA	Telephonically attend status conference re mediation scheduling.	0.70	800.00	\$560.00
07/14/2021	GSG	CA	Email K. Gupta and Grobstein Temple re June fee estimate (.1); review invoices re same (.2); confer with J. Fiero re discount and estimate (.3).	0.60	800.00	\$480.00
07/14/2021	GSG	CA	Review settlement offers of Nuti Hart and Desert Land, and draft/send Desert Oasis settlement offer.	0.50	800.00	\$400.00
07/14/2021	GSG	CA	Emails from/to Court re mediation contact info.	0.20	800.00	\$160.00
07/14/2021	GSG	CA	Email Grobstein Temple re June fee estimate.	0.10	800.00	\$80.00
				5.70		\$4,560.00

Claims Admin/Objections[B310]

07/07/2021	GSG	CO	Revise claim objection and review proposed exhibits.	0.80	800.00	\$640.00
07/08/2021	JDF	CO	Review and revise claim objection (.7); Prepare for and attend hearing on mediation specifics (.6); Send report to client and G. Greenwood re same (.2)	1.50	800.00	\$1,200.00
07/08/2021	GSG	CO	Prepare exhibits to mediation brief/claim objection and confer with M. Renck re same.	0.40	800.00	\$320.00
07/08/2021	GSG	CO	Revise and forward claim objection to J. Fiero.	0.40	800.00	\$320.00
07/09/2021	JDF	CO	Review and comment on mediation brief (.6); Confer with G. Greenwood re brief strategy (.2)	0.80	800.00	\$640.00
07/09/2021	GSG	CO	Review dockets re BG fee objection and claim allowance motion.	0.60	800.00	\$480.00
07/09/2021	GSG	CO	Call with K. Gupta re mediation briefing and status.	0.90	800.00	\$720.00
07/09/2021	GSG	CO	Revise claim objection/mediation brief re basis for sanctions.	3.70	800.00	\$2,960.00
07/09/2021	GSG	CO	Confer with J. Fiero re mediation briefing and order.	0.20	800.00	\$160.00
07/12/2021	GSG	CO	Draft/revise claim objection re sanctions.	0.60	800.00	\$480.00
07/12/2021	GSG	CO	Review order re mediation briefing and draft enclosure letter.	0.80	800.00	\$640.00

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07/12/2021	GSG	CO	Research/review cases re trustee conflicts of interest.	1.70	800.00	\$1,360.00
07/12/2021	GSG	CO	Telephone call with K. Coleman re mediation.	0.20	800.00	\$160.00
07/12/2021	GSG	CO	Review order and emails to/from Gupta and Gubner re deadline for exchange of offers.	0.20	800.00	\$160.00
07/12/2021	GSG	CO	Draft confidential settlement brief.	3.40	800.00	\$2,720.00
07/13/2021	GSG	CO	Emails to/from Fischer re mediation/settlement history.	0.20	800.00	\$160.00
07/13/2021	GSG	CO	Review emails re BG fees, review fee app, and telephone call with S. Sefflin.	0.50	800.00	\$400.00
07/13/2021	GSG	CO	Review order and website re status conference procedures; confer with J. Fiero re same.	0.30	800.00	\$240.00
07/13/2021	GSG	CO	(Hold) Review docket re BG fee app and related fees and objections.	0.70	800.00	\$560.00
07/13/2021	GSG	CO	Research/review AFI cases re conflict analysis.	0.90	800.00	\$720.00
07/13/2021	GSG	CO	Telephone calls (2) with Fischer re mediation and status conference.	0.30	800.00	\$240.00
07/13/2021	GSG	CO	Emails to/from K. Gupta re mediation status and communications with other parties.	0.40	800.00	\$320.00
07/13/2021	GSG	CO	Telephone call with K. Coleman re mediation/settlement status.	0.40	800.00	\$320.00
07/13/2021	GSG	CO	(No charge) Telephone call with K. Gupta re mediation status, settlement offers, and settlement dynamics.	0.70	800.00	\$0.00
07/13/2021	GSG	CO	Additional emails to/from Fischer and Gupta re status conference and mediation scheduling.	0.30	800.00	\$240.00
07/14/2021	GSG	CO	Confer with J. Fiero (.2) re further status conference (.1).	0.30	800.00	\$240.00
07/14/2021	GSG	CO	Review 3/11 transcript and revise mediation brief re undisputed facts and settlement history.	0.70	800.00	\$560.00
07/14/2021	GSG	CO	Review emails re settlement discussions.	0.30	800.00	\$240.00
07/14/2021	GSG	CO	Telephone call with K. Gupta re mediation status and briefing.	0.20	800.00	\$160.00
07/14/2021	GSG	CO	Emails to/from S. Gubner re exchange of fee information.	0.20	800.00	\$160.00

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07/14/2021	GSG	CO	Review J. Fiero comments to claim objection (.3) and incorporate further revisions to objection and mediation statement (1.2).	1.50	800.00	\$1,200.00
07/14/2021	GSG	CO	(Hold) Telephone call with Fischer re mediation appearances and court confirmation re Las Vegas.	0.50	800.00	\$400.00
07/15/2021	JDF	CO	Comment on draft of mediation brief	1.80	800.00	\$1,440.00
07/16/2021	JDF	CO	Work on finalization of mediation brief and attachments (1.3); Confer with G. Greenwood re same (.2); Review settlement offer from Desert Land estate (.2)	1.70	800.00	\$1,360.00
07/18/2021	JDF	CO	Follow emails regarding document exchange	0.10	800.00	\$80.00
07/19/2021	JDF	CO	Emails with Gubner firm re fee disclosure and exchange (.3); Review mediation notes and prepare for mediation (.3)	0.60	800.00	\$480.00
07/21/2021	JDF	CO	Attend and participate in global mediation	2.90	800.00	\$2,320.00
				31.70		\$24,800.00

Compensation Prof. [B160]

07/26/2021	PJJ	CP	Draft first and final fee application.	3.50	460.00	\$1,610.00
07/27/2021	GSG	CP	Review/revise invoices per UST guidelines.	2.60	800.00	\$2,080.00
07/28/2021	JDF	CP	Work on fee application narratives	1.80	800.00	\$1,440.00
07/28/2021	PJJ	CP	Work on final fee application.	5.30	460.00	\$2,438.00
07/28/2021	GSG	CP	Review summary of bills and discount calculations.	0.30	800.00	\$240.00
07/29/2021	JDF	CP	Work on fee application	0.60	800.00	\$480.00
07/29/2021	GSG	CP	Draft/revise factual statement re fee application.	3.70	800.00	\$2,960.00
07/30/2021	JDF	CP	Additional revisions to fee application	1.40	800.00	\$1,120.00
07/30/2021	GSG	CP	Review Guidelines and LBR re fee applications.	0.30	800.00	\$240.00
07/30/2021	GSG	CP	Revise fee application re factual details and history.	1.20	800.00	\$960.00
				20.70		\$13,568.00

TOTAL SERVICES FOR THIS MATTER:

\$50,128.00

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Expenses

06/11/2021	CC	Conference Call [E105] AT&T Conference Call, GIG	16.83
07/16/2021	FE	33085.00001 FedEx Charges for 07-16-21	24.49
07/16/2021	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
07/16/2021	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
07/16/2021	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
07/16/2021	RE2	SCAN/COPY (38 @0.10 PER PG)	3.80
07/16/2021	RE2	SCAN/COPY (40 @0.10 PER PG)	4.00
07/16/2021	RE2	SCAN/COPY (46 @0.10 PER PG)	4.60
07/16/2021	RE2	SCAN/COPY (64 @0.10 PER PG)	6.40
07/16/2021	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
07/27/2021	AT	Auto Travel Expense [E109] Uber Transportation Services, from PSZJ SF to Residence, O. Carpio	30.95
07/31/2021	PAC	Pacer - Court Research	45.10

Total Expenses for this Matter

\$142.97

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REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 07/31/2021

Total Fees	\$50,128.00
Total Expenses	142.97
Total Due on Current Invoice	\$50,270.97

Outstanding Balance from prior invoices as of 07/31/2021 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
126635	11/30/2020	\$89,520.00	\$116.29	\$89,636.29
126901	12/31/2020	\$14,800.00	\$18.80	\$14,818.80
128204	10/31/2020	\$25,840.00	\$90.80	\$25,930.80
128206	01/31/2021	\$5,920.00	\$12.10	\$5,932.10
128207	02/28/2021	\$20,960.00	\$85.88	\$21,045.88
128208	03/31/2021	\$15,360.00	\$23.85	\$15,383.85
128228	04/30/2021	\$9,680.00	\$12.93	\$9,692.93
128229	05/31/2021	\$4,080.00	\$59.06	\$4,139.06
128236	06/30/2021	\$25,520.00	\$24.03	\$25,544.03

Total Amount Due on Current and Prior Invoices: \$262,394.71